

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PANKAJ SHARMA,

Plaintiff,

v.

VIVIAN LIU

Defendant.

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Civil Action No. 20-20268

**DECLARATION OF SAMUEL B.
FINEMAN IN SUPPORT OF MOTION
TO SEAL
ORAL ARGUMENT REQUESTED**

I, **SAMUEL B. FINEMAN**, declare as follows:

1. I am an attorney at law of the State of New Jersey and am associated with the law firm of Semanoff Ormsby Greenberg & Torchia, LLC, attorney for Plaintiff, Pankaj Sharma, in the above-captioned matter. I submit this declaration in support of Plaintiff's Motion to Seal the Record in this matter.

2. All documents attached hereto are true and accurate copies of the originals.

3. The undersigned relies on the Declaration of Plaintiff Sharma and Exhibits "A" through "C" in support of this Motion to Seal.

5. Plaintiff's Motion to Seal rests on the assertions that (1) the facts contained in the pleadings are private in nature and the public does not benefit from their public dissemination or observation; (2) that Plaintiff will be prejudiced and caused serious injury to him mentally, physically and professionally if the Court does not enforce the proposed Order that the record be sealed from the public and (3) Defendant's conduct, now evident through the recently discovered allegations outlined in Exhibits "A" through "C," suggests that she intends to promote the continued dissemination of private facts concerning Plaintiff.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: July 1, 2025

/s/ Samuel B. Fineman
Samuel B. Fineman, Esquire
NJ Bar ID: 005381999